

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

GLORIA ALEXANDER, individually and/or on  
behalf of all others similarly situated,

Plaintiff,

vs.

SAFEGUARD OPERATIONS LLC; and  
SAFEGUARD STORAGE PROPERTIES, LLC  
d.b.a. SAFEGUARD SELF STORAGE,

Defendants.

Case No.: 13-CV-6061 (AMD) (RLM)

**NOTICE OF PLAINTIFFS’  
UNOPPOSED MOTION  
FOR APPROVAL OF  
ATTORNEYS’ FEES AND  
REIMBURSEMENT OF  
EXPENSES**

**PLEASE TAKE NOTICE** that for the reasons set forth in the Memorandum of Law in Support of Plaintiffs’ Motion for Approval of Attorneys’ Fees and Reimbursement of Expenses, the accompanying Declaration Christopher Q. Davis, and the supporting exhibits attached thereto, Plaintiffs respectfully request that the Court enter an Order:

(1) awarding Class Counsel attorneys’ fees in the sum of \$191,666.66, which is one- third (1/3) of the Settlement Amount, inclusive of the approximately \$6,000 in actual out-of-pocket costs and expenses;

(2) granting such other, further, or different relief as the Court deems just and proper.

Plaintiffs have submitted a Proposed Order, attached as Exhibit A to the Notice of Motion for Certification of Settlement Class, Final Approval of Class Action Settlement, Approval of Service Awards, and Approval of FLSA Settlement (“Motion for Final Approval”), concurrently filed in the above-captioned action.

Dated: December 29, 2016  
New York, New York

Respectfully submitted,

By: /s/

Christopher Q. Davis, Esq. (CD-7282)  
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